

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' MOTION TO SEAL DEFENDANTS' OPPOSITION TO PLAINTIFF
VIDEO GAMING TECHNOLOGIES INC.'S MOTION IN LIMINE REGARDING
CASTLE HILL GAMING DEFENSES AND SUPPORTING DECLARATION**

Pursuant to Local Rule 79.1, and paragraph 2(f) of the Stipulated Protected Order (ECF No. 55) (the "Protective Order"), Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"), hereby request that the Court enter an order sealing Defendant's unredacted Opposition to Plaintiff Video Gaming Technologies Inc.'s Motion in Limine Regarding Castle Hill Gaming Defenses and the Declaration of Robert C. Gill in Support of Defendants' Opposition to Plaintiff Video Gaming Technologies Inc.'s Motion in Limine Regarding Castle Hill Gaming Defenses (collectively, ECF No. 224). In support of this request to seal, Defendants state as follows:

1. Portions of the Opposition contain information designated by Plaintiff and Defendants as Confidential or Highly Confidential Information pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

2. Exhibit A to the Declaration of Robert C. Gill consists of excerpts from the Deposition of Sarah Gozdecki Carlson dated June 21, 2018. Plaintiff designated the deposition

transcript as Highly Confidential pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

3. Exhibit B to the Declaration of Robert C. Gill consists of excerpts from the Deposition of Larry Graham dated May 15, 2018. Castle Hill designated the deposition transcript as Highly Confidential pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

4. Exhibit C to the Declaration of Robert C. Gill consists of excerpts from the Deposition of Will Harvie dated June 14, 2018. Plaintiff designated the deposition transcript as Highly Confidential pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

5. Exhibit D consists of excerpts from the Deposition of Ryan North dated April 26, 2018. Plaintiff designated the deposition transcript as Highly Confidential pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

6. Exhibit E consists of excerpts from the Deposition of Karl Roelofs dated June 14, 2018. Plaintiff designated the deposition transcript as Highly Confidential pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

7. Exhibit F to the Declaration of Robert C. Gill consists of excerpts from the Deposition of Jay Sevigny dated July 12, 2018. Plaintiff designated the deposition transcript as Highly Confidential pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

8. Exhibit G to the Declaration of Robert C. Gill consists of excerpts from the Deposition of James Starr dated May 23, 2018. Plaintiff designated the deposition transcript as Highly Confidential pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

9. Exhibit H to the Declaration of Robert C. Gill consists of excerpts from the Deposition of Jon Yarbrough dated July 11, 2018. Plaintiff designated the deposition transcript as Highly Confidential pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

10. Pursuant to Local Rule 79.1, General Order 08-11, and the Protective Order, Castle Hill filed both a public, redacted Opposition with public, redacted Exhibits A-H to the Declaration of Robert C. Gill, and a sealed, unredacted Opposition, and a sealed, unredacted Exhibits A-H to the Declaration of Robert C. Gill.

WHEREFORE, Defendants respectfully request that the Court enter an Order sealing the Opposition and the Declaration of Robert C. Gill.

Dated: November 16, 2018

Respectfully submitted,

/s/ Robert C. Gill
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2018, I caused a copy of the foregoing **DEFENDANTS' MOTION TO SEAL DEFENDANTS' OPPOSITION TO PLAINTIFF VIDEO GAMING TECHNOLOGIES INC.'S MOTION IN LIMINE REGARDING CASTLE HILL GAMING DEFENSES AND SUPPORTING DECLARATION** to be filed using the Court's ECF system, which will provide electronic notification of filing to the following counsel for Plaintiff:

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